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**From:** Lewis, Marianne [Lewis.Marianne@epa.gov]  
**Sent:** 10/22/2021 6:49:51 PM  
**To:** Eagle, Venus [Eagle.Venus@epa.gov]  
**Subject:** FW: label comments for 59639-151  
**Attachments:** 59639-151 clothianidin label comments 1oct21.doc; 059639-00151.20211013.V101705FS.AMEND.Red.pdf; 059639-00151.20211013.V101705FS.AMEND.Clean.pdf

So Sue made all of the requested changes from my label comments (attached) except for copying the plant back instructions that are currently on the seed bag tag and putting them with the 'on farm' instructions... her logic is below ... she says that 'rotational crop plant back intervals is provided to all V-10170 5 FS insecticide treated seeds regardless how the seeds are treated ( on-farm or commercial)'

**Deliberative Process / Ex. 5**

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The highlighted (RED) version encompasses all of the changes we've made to the label... probably easier to just look at the clean label.

Would like your opinion before I send her a few comments... nothing major ... too many extra brackets ... the rest is ok.

Thanks

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**From:** Shen, Sue <Sue.Shen@valent.com>  
**Sent:** Wednesday, October 13, 2021 7:22 PM  
**To:** Lewis, Marianne <Lewis.Marianne@epa.gov>  
**Cc:** Duncan, Ed <Edward.Duncan@valent.com>  
**Subject:** FW: label comments for 59639-151

Hi Marianne:

Please see the relined copy in attachment 2 and clean copy in attachment 3. In addition to your request, the Resistance Management has also been updated per PRN 2017-1( page 4 in attachment 3).

Would like to address your comment item #4 , " On page 6 of the label, need to include the plant back instructions for the on farm uses that are seen on the seed bag tag – please copy the "Rotational Crop Plant-Back Intervals" table from page 17 and place it directly after the "On-Farm Application" table."

The ultimate audiences for the rotational crop plant back intervals are the growers. The plant- back restriction instruction is not relevant to how the seeds are treated (on-farm or commercial ). Rotational Crop Plant-Back Intervals information is provided to all V-10170 5 FS insecticide treated seeds regardless how the seeds are treated ( on-farm or commercial).

Thanks

Sue

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**From:** Lewis, Marianne <Lewis.Marianne@epa.gov>  
**Sent:** Wednesday, October 06, 2021 1:01 PM  
**To:** Duncan, Ed <Edward.Duncan@valent.com>  
**Subject:** label comments for 59639-151

A few more... not bad.

Have a great evening.

Marianne

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